

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	
	:	
v.	:	CRIMINAL DOCKET NO. 2:11-cr-00727-1
	:	
KERMIT GOSNELL	:	HONORABLE CYNTHIA M. RUFÉ

MOTION TO CONTINUE SENTENCE

AND NOW, Defendant Kermit Gosnell, through his attorney, Jack McMahon, Esquire, hereby submits this Motion to Continue Sentence and avers the following:

1. This matter is currently scheduled for sentencing on December 3, 2013, in Philadelphia, Pennsylvania.
2. Defense Counsel is currently in the middle of a jury trial, USA v. Rafael Cordero, before Judge Paul Diamond. This case is scheduled to resume Monday, December 2, 2013. Immediately thereafter, Defense Counsel will begin a homicide trial, Commonwealth v. Michael Morris, before Judge Glenn Bronson in Philadelphia County.
3. Counsel has been continuously on trial since the beginning of September, USA v. Matthew Kolodesh, a death penalty jury trial, Commonwealth v. Axel Barreto and now USA v. Rafael Cordero.
4. Due to Defense Counsel's trial schedule, additional time is needed to prepare for Defendant's sentencing.

WHEREFORE, Defendant respectfully requests a continuance in the above-captioned matter.

Respectfully submitted,

Date: November 27, 2013

/s Jack McMahon

Jack McMahon

Attorney for Kermit Gosnell

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this date a copy of the foregoing Motion to Continue Sentence was electronically served on the following:

Jessica Natali, AUSA
Office of the United States Attorney
615 Chestnut Street, Suite 1250
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Joan E. Burnes, AUSA
Office of the United States Attorney
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Philadelphia, PA 19106

Date: November 27, 2013

/s/ Jack McMahon
Jack McMahon

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: CRIMINAL DOCKET NO. 2:11-cr-00727-1

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: HONORABLE CYNTHIA M. RUFÉ

ORDER

It is hereby ORDERED and DECREED that Defense Motion to Continue Sentence in the above-captioned matter is hereby GRANTED.

J.